

Arjun Vasan
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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Arjun Vasan,
Plaintiff and Counter-Defendant

vs.

Checkmate.com, Inc.,
(dba "Checkmate"),
Defendant and Counterclaimant

Case No.: 2:25-cv-00765-MEMF-ASx
Hon. Alka Sagar | DISCOVERY MATTER

**DECLARATION OF ARJUN VASAN IN
FURTHER SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL DISCOVERY;
DETERMINE SUFFICIENCY; AND FOR
A PROTECTIVE ORDER PHASING
DISCOVERY (DKT. 113)**

Complaint Filed: January 28, 2025
Hearing Date: December 2, 2025
Hearing Time: 11:00 A.M.
Courtroom: 540

I, ARJUN VASAN, declare:

1. I am the Plaintiff in this action. I submit this declaration in further support of my motion to compel discovery, determine sufficiency and for a protective order phasing discovery. I have personal knowledge of the facts herein and could and would testify competently.

2. Makitalo ¶ 2 is misleading. During the Rule 26(f) Conference, I insisted I would file the report as is my right as Plaintiff, while Ms. Makitalo pushed for Checkmate to draft. Only when counsel agreed to exchange sections at the same time, did I agree to permit Checkmate to draft the report.
3. On August 12, I emailed counsel, requesting Checkmate’s sections, and only then did Ms. Makitalo state that it was her view that I would be unilaterally sending my sections for it to integrate. That was not what I agreed to, as I noted (in Checkmate’s Exs. A-B).
4. I repeatedly offered an equitable exchange so neither party would be disadvantaged. I specified a clear timeline, whereas counsel refused to offer any commitment to when I would receive the integrated report. This is also clear from Checkmate’s Ex. A-B.
5. Makitalo ¶¶ 14-20 is at worst a miscommunication, there was no intentional “bait and switch” on my part. When I said I “plan to seek full bifurcation as well (in other issues), not just of discovery”, I intended that to mean separate trials for the counterclaims, which is the change I made. The relevant exchange is available in its Exs. G, H and I.
6. When Counsel objected about the new section, I reverted the change to avoid dispute—even though I had stated, in my view, I was going to make that change and they agreed.
7. I would not have thought to even mention the incident, which was amongst the milder disagreements of the day. I certainly would not have dedicated several paragraphs to it.
8. I think it is evident from Checkmate’s own exhibits, that as a first time pro se litigant, who had never before completed a Rule 26(f) Report I was conducting myself diligently and in good faith despite repeated threats from Checkmate counsel to “tell the court” that I was not cooperating.
9. Makitalo ¶ 58, where I stated, “only on this issue”, was a reflection of Checkmate’s repeated demand to meet only on its own issues for several previous several weeks.
10. To avoid burdening the Court, I will not contest each and every line in the Declaration. I have covered the main points in my brief. Other than for authentication, many of counsel’s statements are misleading and should not be assumed as factually true.

11. I declare under the penalty of perjury of the Laws of the United States of America that the foregoing statements are true and correct.

Executed on: November 18, 2025

/s/ Arjun Vasana

In Cerritos, California

Arjun Vasana, Plaintiff In Pro Per

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